

**EXHIBIT B**

**DUANE MORRIS LLP**  
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*Attorneys for Defendant  
Dell Financial Services, LLC*

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Ashley Gager, : COURT OF COMMON PLEAS  
Plaintiff : WAYNE COUNTY  
vs. : CIVIL ACTION  
Dell Financial Services, LLC, : NO. 627-Civil-2011  
Defendant. :  
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**NOTICE OF REMOVAL**

**TO THE PROTHONOTARY OF THE ABOVE CAPTIONED COURT:**

**PLEASE TAKE NOTICE** that on November 11, 2011, Defendant, Dell Financial Services, LLC, through its undersigned counsel, Duane Morris LLP, filed a Notice of Removal of the above-captioned action to the United States District Court for the Middle District of Pennsylvania. A copy of the Notice of Removal, with all exhibits, is being filed herewith and is attached hereto as Exhibit "A."

**PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. §§ 1441 and 1446, the filing of the Notice of Removal in the United States District Court for the Middle District of Pennsylvania and in this Court effect the removal of the above-captioned action and this Court shall proceed no further with this action.

By:



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*Attorney for Defendant  
Dell Financial Services, LLC*

Dated: November 11, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of November, 2011, I caused to be mailed, via First Class U.S. Mail, postage prepaid, a true and correct copy of the foregoing Notice of Removal to:

Brett Freeman, Esquire  
Sabatini Law Firm, LLC  
216 North Blakely Street  
Dunmore, Pennsylvania 18512



Anthony L. Gallia